

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 Michael Angelo,  
D-2 Hassan Kamal Fayd,  
D-3 Mirna Kamal Fayad  
aka "Myrna Kamal Fayad",  
D-4 Cory Justin Mann,  
D-5 Thomas Reed Quartz, and  
D-6 Rosina Angelo  
aka "Rosina Caruvana",

Case: 4:22-cr-20188  
Judge: Kumar, Shalina D.  
MJ: Ivy, Curtis  
Filed: 04-06-2022 At 08:53 AM  
IN RE: SEALED MATTER (sk)

Defendants.

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**GOVERNMENT'S MOTION AND SUPPORTING BRIEF  
TO SEAL INDICTMENT AND ARREST WARRANTS**

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The United States of America hereby moves for an order sealing the indictment and arrest warrants in this case and states:

1. The indictment in this case charges the defendants with one or more federal crimes.
2. Rule 6(e)(4) of the Federal Rules of Criminal Procedure provides:

*(4) Sealed Indictment.* The magistrate judge to whom an indictment is returned may direct that the indictment be kept secret until the defendant is in custody or has been released pending trial. The clerk must then seal the indictment, and no person may disclose the indictment's existence except as necessary to issue or execute a warrant or summons.

Fed.R.Crim.P. 6(e)(4).

3. The government requests that the Indictment and arrest warrants be sealed because it is concerned that the defendants may attempt to flee, destroy evidence, or intimidate witnesses if the Indictment and arrest warrants become a matter of public record before the defendants are arrested.

WHEREFORE, the government requests this Court to issue an order sealing the Indictment and arrest warrant.

Respectfully submitted,

Dawn N. Ison  
United States Attorney

s/Mark McDonald  
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Dated: April 6, 2022

IT IS SO ORDERED.

  
Curtis Ivy, Jr.  
United States Magistrate Judge

Entered: April 6, 2022